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REPLY TO: HAMPTON ROADSOFFICE

February 1, 2012

**Via E-mail and First Class Mail**

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RE: Victoria L. Frazier v. Experian Information Solutions, Inc., et al  
Civil Action No: 3:11-cv-00497

Dear Ms. Flynn and Gentlemen:

Attached hereto please find the following:

1. Notice of 30(b)(6) Deposition scheduled for February 15, 2012 at 10:00 a.m.
2. Notice of Deposition for the ACDV Operators scheduled for February 23, 2012 at 10:00 a.m.

Thank you for your cooperation and assistance in this regard, I remain

Very truly yours,

  
Leonard A. Bennett

LAB:vlw

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**VICTORIA L. FRAZIER,**

**Plaintiff,**

**v.**

**CIVIL NO. 3:11cv497**

**EXPERIAN INFORMATION SOLUTIONS,  
INC., TRANS UNION, LLC and LITTON  
LOAN SERVICING, L.P.,**

**Defendants.**

**NOTICE OF 30(b)(6) DEPOSITION**

TAKE NOTICE that on the 15<sup>th</sup> day of February 2012, at 10:00 a.m., and continuing until completed, in the law offices of TROUTMAN SANDERS, 222 Central Park Avenue, Suite 2000, Virginia Beach, VA 23462, Plaintiff, through her attorney, before a duly authorized Notary Public, will proceed to take the video deposition of the corporate designee of the Defendant, LITTON LOAN SERVICING, L.P. ("LITTON") pursuant to Fed. R. Civ. P. 30(b)(6), the Plaintiff identifies the following topics on which examination will take place:

1. The history and corporate structure of Litton Loan Servicing, LP. and any subsidiaries or parent companies.
2. The styles, number, allegations and outcome of consumer lawsuits filed against LITTON by other consumers during the last five years in which the consumer alleged that LITTON violated 15 U.S.C. § 1681s-2(b).
3. The manner in which LITTON informed itself of its obligations to comply with 15 U.S.C. § 1681s-2(b).
4. LITTON's knowledge and understanding of its obligations under 15 U.S.C. § 1681s-2(b) and how it obtained such understanding.

5. **LITTON'S** knowledge and understanding of the Fourth Circuit's explanation of a furnisher's duties under 15 U.S.C. § 1681s-2(b) under the *Johnson v. MBNA* and *Saunders v. BB & T* decisions and how it obtained such understanding.

6. All actions, steps, procedures and systems that **LITTON** claims existed at Defendant's company to ensure that it fully understood and also complied with its duties under 15 U.S.C. § 1681s-2(b) since 2009.

7. **LITTON's** knowledge of the requirements of the FCRA since 2009.

8. **LITTON's** knowledge of the reporting requirements for the CDIA's Metro II format.

9. All facts regarding the history of the disputed **LITTON** mortgage account, all contacts with any person and regarding the account, and all documents regarding the account.

10. The credit reporting of the mortgage account that **LITTON** forwarded to the Credit Reporting Agencies since June 2006.

11. The full process, procedure and details of any audits made of the work of BOA's employees who processed the ACDV disputes in this case.

12. **LITTON's** actual knowledge of each communication to which it was a party regarding the Plaintiff, the Plaintiff's credit reporting disputes and or the **LITTON** mortgage account that is the subject of this litigation.

13. The method manner and terms of compensation for each **LITTON** employee or ex-employee who did participate in the investigation of the Plaintiff's credit reporting disputes.

14. The meaning, content and or decoding of the **LITTON's** records regarding the Plaintiff or the **LITTON** mortgage account at issue in this case, including but not limited to: ACDVs; any account database screens; and **LITTON's** archived investigation records.

15. **LITTON's** policies and or procedures for conducting investigations of consumer credit report disputes received through the consumer reporting agencies, including all details as to who conducts such disputes, the guidelines by which such disputes would be completed, all documents and records or other information considered in such investigation.

16. **LITTON's** best estimate of the expense and cost of each ACDV investigation to it for each ACDV dispute received regarding the Plaintiff.

17. Everything that was done regarding the Plaintiff's disputes made pursuant to 15 U.S.C. §§1681i and 1681s-2(b), including all dates of communications or actions, all documents considered, all persons involved, the locations of all such actions, all steps taken to investigate or verify the subject accounts and all audits or reviews by or for **LITTON** of these actions or events.

18. **LITTON's** knowledge regarding the impact of a tradeline with a CCC field value of XB on a consumer's credit score.

19. The substance of Defendant's e-Oscar scorecard for each month since January 1, 2010.

20. All evidence, documents and proof evaluated or considered by **LITTON** in its decision to verify the account as accurately reported in response to the Plaintiff's credit reporting disputes (i.e. the ACDV disputes).

21. All information in the Plaintiff's credit report that **LITTON** now admits was inaccurate.

22. All information that **LITTON** sent to the national credit reporting agencies that it now admits was inaccurate.

23. The names and addresses of the person(s) at **LITTON** who were responsible for creating and drafting the ACDV dispute procedures followed by **LITTON** in this case.

24. The full background and process by which **LITTON** created and drafted the ACDV dispute procedures followed by **LITTON** in this case.

25. Your knowledge of the *Bach v. First Union* FCRA case, verdict and appeal.

26. Every action taken (or not taken) by **LITTON** in regard to the Plaintiff that was not as **LITTON** intended.

27. Every mistake that you now admit your company made with regard to the Plaintiff and/or the disputed **LITTON** loan.

Respectfully submitted

**VICTORIA L. FRAZIER,**

By

Of Counsel

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing document has been forwarded to the following on this the 1st day of ~~January~~ <sup>Feb</sup>, 2012, as follows:

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**UNITED STATES DISTRICT COURT  
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**VICTORIA L. FRAZIER,**

**Plaintiff,**

**v.**

**CIVIL NO. 3:11cv497**

**EXPERIAN INFORMATION SOLUTIONS,  
INC., TRANS UNION, LLC and LITTON  
LOAN SERVICING, L.P.,**

**Defendants.**

**NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that on the 23th day of February, 2012, at 10:00 a.m., and continuing until completed, at the offices of TROUTMAN SANDERS, 222 Central Park Avenue, Suite 2000, Virginia Beach, VA 23462, Plaintiff, through her attorney, pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, will take the video and telephonic deposition of *all ACDV Operators who processed the Plaintiff's disputes.*

Respectfully submitted

**VICTORIA L. FRAZIER,**

By

Of Counsel



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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing document has been forwarded to the following on this the 1st day of ~~January~~, 2012, as follows:

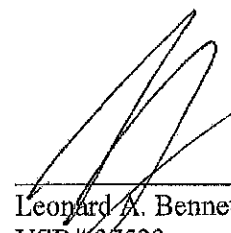
*Feb*

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